

Jorge Alejandro Rojas
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Plaintiff in Pro Se
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424-219-1582

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,
Plaintiff,
v.
UNPLUGGED MEDIA, LLC, et al,
Defendants.

Case No. 2:23-cv-02667-AH-KS

**SUPPLEMENTAL DECLARATION
OF JORGE ALEJANDRO ROJAS IN
SUPPORT OF MOTION FOR
DEFAULT JUDGMENT**

I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

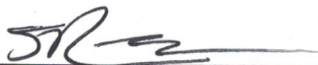
1. I am the Plaintiff in this case, and make the following statements based on my personal knowledge and records. If called to testify concerning any of these statements, I will be able to do so.
2. I make the statements in this declaration to supplement my earlier declaration, dated January 31, 2025 (Dkt. 99-1), in support of Plaintiff's Motion for Default Judgment (Dkt. 99). This declaration is intended to provide the Court with the information required under L.R. 55-1.
3. As to L.R. 55-1(a):

- a. As to Defendant Unplugged Media, LLC, (“Unplugged Media”), Fed. R. Civ. P. 55(a) default was entered by the Clerk on November 4, 2024 (Dkt. 88).
 - b. As to Defendant Alexander Bykhovsky aka Alex Gold (“Bykhovsky”), Fed. R. Civ. P. 55(a) default was entered by the Clerk on September 23, 2024 (Dkt. 77).
 - c. As to Defendant Chris Biz Services, LLC (“CBS”) the Wyoming entity, Fed. R. Civ. P. 55(a) default was entered by the Clerk on October 7, 2024 (Dkt. 84).
 - d. As to Defendant Chris Biz Services, LLC (“CBS”) the Texas entity, Fed. R. Civ. P. 55(a) default was entered by the Clerk on October 7, 2024 (Dkt. 85).
 - e. As to Defendant Christopher Gutierrez Cuenza aka Chris Cuenza (“Cuenza”), Fed. R. Civ. P. 55(a) default was entered by the Clerk on October 7, 2024 (Dkt. 83).
 - f. As to Defendant Alex Gold Holdings LLC (“AGH”), Fed. R. Civ. P. 55(a) default was entered by the Clerk on November 19, 2024 (Dkt. 95).
4. As to L.R. 55-1(b): Default was entered as to all defendants identified above as to the Second Amended Complaint (Dkt. 59).
 5. As to L.R. 55-1(c):
 - a. I am unaware of Unplugged Media being an infant or incompetent person.
 - b. I am unaware of Bykhovsky being an infant or incompetent person.
 - c. I am unaware of CBS, the Texas entity, being an infant or incompetent person.
 - d. I am unaware of CBS, the Wyoming entity, being an infant or incompetent person.
 - e. I am unaware of Cuenza being an infant or incompetent person.
 - f. I am unaware of AGH being an infant or incompetent person.
 6. As to L.R. 55-1(d):
 - a. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to Unplugged Media.

- b. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to Bykhovsky.
 - c. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to CBS, the Texas entity.
 - d. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to CBS, the Wyoming entity.
 - e. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to Cuenza.
 - f. The Servicemembers Civil Relief Act (50 U.S.C. App. § 521) does not apply as to AGH.
7. As to L.R. 55-1(e): I served copies to each defendant of the Notice of Motion and the Motion for Default Judgment (“Motion”), at least seven (7) days prior to the March 12, 2025 hearing. Specifically, as to the sole appearing defendant, Bykhovsky:
- a. On February 1, 2025, I mailed a copy of the Motion to Alexander Bykhovsky via GlobalPost to 40 Calle Elbrus Panama City, 0801 Panama. This is the address Bykhovsky has listed in the docket for this case.
 - b. On February 1, 2025, I mailed a copy of the Motion to Alexander Bykhovsky 1709 C. Leon M Acuna San Juan, PR 00911 via USPS First Class Mail. This is Bykhovsky’s address which he listed when signing an October 22, 2024 Joint Stipulation for Entry of Consent Judgment in the District of Nevada in *Callier v. Alexander Bykhovsky*, 2:24-cv-001003.
 - c. On February 1, 2025, I mailed a copy of the Motion to Alexander Bykhovsky 3064 KISHNER DR 111 LAS VEGAS, NV 89109 via USPS First Class Mail. This is the registered agent address for Alex Gold Holdings, LLC.
8. As to L.R. 55-1(e): On April 16, 2025, I mailed a copy of this supplemental declaration, the notice that is being used to file it into the docket, and notice of the May 7, 2025 1:30 PM hearing to each defendant. Specifically, as to the sole

1 appearing defendant, Bykhovsky, (1) via GlobalPost to 40 Calle Elbrus Panama
2 City, 0801 Panama, (2) 1709 C. Leon M Acuna San Juan, PR 00911 via USPS First
3 Class Mail, (3) 3064 KISHNER DR 111 LAS VEGAS, NV 89109 via USPS First
4 Class Mail.

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6 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
7 and correct. Executed on April 16, 2025, in Bolingbrook, IL.

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